

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SUPPRESSED

FILED

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEMARIO R. HUNTER,
KEOMBRA AURAY JAMES, and
SURRAYAH HILL,

Defendants.

SEP 19 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

4:19CR764 JAR/NCC

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about March 18, 2019, in St. Louis City, within the Eastern District of Missouri,

**DEMARIO R. HUNTER, KEOMBRA AURAY JAMES,
and SURRAYAH HILL,**

the Defendants herein, acting together, with intent to cause death and serious bodily harm, and resulting in death, did attempt to take from the person and presence of another, by force, violence, and intimidation, a motor vehicle, that is, a 2013 Ford Escape, vehicle identification number ("VIN") 1FMCU0J98DUB25210, that had been transported in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2, and punishable under Title 18, United States Code, Section 2119(3).

COUNT TWO

The Grand Jury further charges that:

On or about March 18, 2019, in St. Louis City, within the Eastern District of Missouri,

**DEMARIO R. HUNTER, KEOMBRA AURAY JAMES,
and SURRAYAH HILL,**

the Defendants herein, acting together, knowingly possessed and discharged a firearm during and in relation to a crime of violence which may be prosecuted in a Court of the United States, to wit: carjacking, as set forth in Count One of this Indictment; and in the course thereof, caused the death of a person through the use of a firearm, the killing of whom constituted murder as defined in Title 18, United States Code Section 1111, in that the killing was committed willfully, deliberately, maliciously and with malice aforethought.

In violation of Title 18, United States Code, Sections 924(c)(1), 924(j), and 2.

COUNT THREE

The Grand Jury further charges that:

On or about March 18, 2019, in St. Louis City, within the Eastern District of Missouri,

**DEMARIO R. HUNTER, KEOMBRA AURAY JAMES,
and SURRAYAH HILL,**

the Defendants herein, acting together, knowingly possessed, brandished, and discharged a firearm, in furtherance of a crime of violence which may be prosecuted in a Court of the United States, to wit: carjacking, as set forth in Count One of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(iii).

COUNT FOUR

The Grand Jury further charges that:

On or about March 18, 2019, in St. Louis City, within the Eastern District of Missouri,

DEMARIO R. HUNTER,

the Defendant herein, knowing he had previously been convicted in a court of law of one or more

crimes punishable by a term of imprisonment exceeding one year, knowingly possessed ammunition, which had traveled in interstate or foreign commerce during or prior to being in defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

JASON S. DUNKEL, #65886MO
Assistant United States Attorney